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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS MOLINA, JHONY SILVA, MARIA ELENA HERNANDEZ, O.C., SANDHYA LAMA, S.K., TEOFILO MARTINEZ,

**Plaintiffs,**

VS.

KRISTI NOEM, in her official capacity as Secretary of Homeland Security, UNITED STATES DEPARTMENT OF HOMELAND SECURITY, and UNITED STATES OF AMERICA,

### Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF JESSICA KARP  
BANSAL IN SUPPORT OF PLAINTIFFS'  
REPLY IN SUPPORT OF MOTION TO  
POSTPONE EFFECTIVE DATE OF  
AGENCY ACTION**

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**DECLARATION OF JESSICA KARP BANSAL**

I, Jessica Karp Bansal, declare as follows:

1. I am an attorney at law duly licensed and entitled to practice in the State of California. I am an Attorney at National Day Laborer Organizing Network, counsel of record in this action for Plaintiffs. I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Plaintiffs' Reply in Support of Motion to Postpone Effective Date of Agency Action.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a printed screen grab of a News Nation Video where President Trump says of Haitian TPS holders in Springfield, Ohio: “[Y]ou have to remove the people. We cannot destroy our country.... In my opinion, it’s not legal.... They have to be removed.” President Trump further responds to a question from the reporter asking, “So you would revoke the Temporary Protected Status,” by stating, “Absolutely I would revoke it,” at approx. 12:00, NewsNation (Oct. 2, 2024). The video is available for viewing at <https://www.newsnationnow.com/politics/2024-election/trump-springfield-haitian-migrants-removed/>.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the U.S. Department of Homeland Security Press Release, dated July 7, 2025, *DHS Terminates TPS for Nicaragua: It was Never Meant to Last 25 Years.*

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Department of State Travel Advisory regarding Honduras dated December 10, 2024, urging travelers to reconsider traveling to Honduras due to crime, including “widespread” “[v]iolent gang activity, such as extortion, violent street crime, rape, narcotics, and human trafficking.”

6. Attached hereto as **Exhibit 4** is a true and correct copy of the Department of State Travel Advisory regarding Nicaragua dated December 13, 2024, warning travelers to reconsider visiting Nicaragua “due to arbitrary enforcement of laws, the risk of wrongful detention, and limited healthcare availability.”

1       7. Attached hereto as **Exhibit 5** is a true and correct copy of the Department of State  
 2 Travel Advisory regarding Venezuela advising “Do not travel to Venezuela due to the high risk of  
 3 wrongful detentions, terrorism, kidnapping, the arbitrary enforcement of local laws, crime, civil  
 4 unrest, poor health infrastructure.”

5       8. Attached hereto as **Exhibit 6** is a true and correct copy of the Department of State  
 6 Travel Advisory regarding Haiti dated July 15, 2025, advising “Do not travel to Haiti due to  
 7 kidnapping, crime, terrorist activity, civil unrest, and limited health care.”

8       9. Attached hereto as **Exhibit 7** is a true and correct copy of the transcript of the speech  
 9 President Trump gave addressing GOP Senators at Mar-a-Lago on February 7, 2025, stating that  
 10 there were “murderers” and “prisoner[s]” “from Africa, from Asia, not just South America”, along  
 11 with a screen grab below from the video clip at approx. 26:59–28:23. The video is available for  
 12 viewing at: <https://perma.cc/EQ5-TSBP> and <https://rollcall.com/factbase/trump/transcript/donald-trump-speech-gop-senators-mar-a-lago-february-7-2025/>.



10     10. Attached hereto as **Exhibit 8** is a true and correct copy of the transcript of the speech  
 11 President Trump gave at a political rally in Racine, Wisconsin on June 18, 2024, during which  
 12 President Trump stated that very bad people” from “Congo and Africa,” “from Asia,” “from the  
 13 Middle East,” and “from South America” have entered the United States “so illegally,” along with a  
 14 screen grab below from the video clip at approx. 16:50-17:00. The video is available at:  
 15 <https://perma.cc/D2LK-FRXW>.  
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6 11. Attached hereto as **Exhibit 9** is a true and correct copy of a news clip by Ginger  
7 Gibson, *Trump Says Immigrants Are “Poisoning the Blood of Our Country*, NBC News (Dec. 17,  
8 2023), where President Trump stated “[t]hey’re poisoning the blood of our country . . . [N]ot just in  
9 South America, not just [the] three or four countries that we think about, but all over the  
10 world. They’re coming into our country from Africa, from Asia, all over the world.”, along with a  
11 screen grab of the video clip at approx. 00:12. The video is available for viewing at available at:  
12 <http://www.c-span.org/clip/campaign-2024/donald-trump-on-illegal-immigrants-poisoning-the-blood-of-our-country/5098439>, and <https://tinyurl.com/myvdd3yu>.  
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21 I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct. Executed this 18th day of July 2025, at Claremont, CA.  
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/s/ Jessica Karp Bansal  
Jessica Karp Bansal